

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA** §  
§  
v. § **CRIMINAL NO. 18-CR-368**  
§  
**CHRISTOPHER INCE M.D.** §

**DEFENDANT CHRISTOPHER INCE UNOPPOSED**  
**MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant Christopher Ince by and through his counsel files this Unopposed Motion to Modify Conditions of Release and would respectfully show:

**I.**

1. On October 23, 2019, a Superseding Indictment was returned in *United States v. Swiencinski et al.*, which charged the defendant with conspiracy to commit mail fraud, wire fraud and health care fraud (Count One) in violation of Title 18, United States Code, Section 1349 and health care fraud (Counts 8, 9, 10) in violation of Title 18, United States Code, Section 1347.
2. On October 29, 2019, Dr. Ince was made his initial appearance before United State Magistrate Judge Rebecca Rutherford and was released on conditions of release, one of which restricted his travel to the state of Texas.
3. On November 26, 2019, Dr. Ince submitted a motion to modify his conditions of release to allow him to continue to provide medical services to individuals with

Medicare and Medicaid and submit claims for reimbursement. The motion was granted on January 24, 2020.

4. Dr. Ince now submits this motion to modify his conditions of release to allow his travel throughout the United States without the need to seek permission from United States Probation office, and counsel for the Department Justice and file a written request with this Court. Dr. Ince has family members who reside in Virginia, and he frequently travels to visit throughout the year. Dr. Ince also attends continuing medical education conferences held outside the state of Texas. Dr. Ince request this Court to modify his Conditions of Release to allow travel within the United States without restriction. Dr. Ince has significant ties to Texas and the United States and there is no reason to believe he poses a risk of flight.

5. Dr. Ince has complied with all conditions of his release.

6. On June 6, 2023, counsel conferred with Department of Justice Trial Attorney Daniel Griffin with regard to this motion and he is unopposed.

WHEREFORE PREMISES CONSIDERED, Defendant Christopher Ince respectfully request the Court grant this motion to modify his conditions of release.

Respectfully submitted,

HOLLAND & KNIGHT

/s/ Samuel J. Louis

Samuel J. Louis  
Holland & Knight  
811 Main Street, Suite 2500  
Houston, TX 77002  
Email: samuel.louis@hklaw.com  
Telephone (713) 244-6860

**CERTIFICATE OF CONFERENCE**

I hereby certify that on June 6, 2023, I conferred with Department of Justice Trial Attorney Daniel Griffin regarding this motion and the government is unopposed.

/s/ Samuel J. Louis

**Samuel J. Louis**

**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2023, the foregoing has been served on counsel of record for the Government by Notice of Electronic Filing via CM/ECF, in accordance with the Federal Rules of Criminal Procedure.

/s/ Samuel J. Louis

**Samuel J. Louis**